

IRVING COHEN

ATTORNEY AT LAW

(212) 964-2544
FAX (212) 406-2313
ICOHENLAW@MSN.COM

225 BROADWAY
SUITE 2700
NEW YORK, N.Y. 10007

March 30, 2020

VIA ECF

Hon. Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *United States v. Tasha Burnett*, S1 20 Cr. 52 (DLC)

Dear Judge Cote:

I am the attorney for Tasha Burnett in the abovementioned case having been duly appointed pursuant to the Criminal Justice Act. This letter is respectfully submitted to request that the Court authorize the appointment of my associate, Chanel Sochacki, Esq., to assist me in representing Ms. Burnett in this matter.

In several recent cases, judges in this District have approved the appointment of an associate to assist me in multi-defendant cases in which there was a large amount of discovery and, often, complicated factual and legal issues. As with those cases, this one has presented me with the need for assistance from Ms. Sochacki. The discovery in this case is voluminous and includes: three months of intercepts resulting in approximately 25,000 calls/communications, GPS data, toll data, surveillance (consisting of both videos and photographs), controlled buys, evidence seized from warrants, and possible DNA evidence.

Ms. Sochacki has been appointed as an associate attorney in several cases in this district, including: *United States v. Martinez*, 17 Cr. 123 (LAP); *United States v. Lopez*, 16 Cr. 719 (RJS); *United States v. Gonzalez*, 15 Cr. 608 (KPF); *United States v. Gallicchio*, 17 Cr. 390 (ALC); *United States v. Melman*, 17 Cr. 350 (KBF); and *United States v. Griffin*, 18 Cr. 454 (KPF). Ms. Sochacki has been instrumental in assisting me in discovery review and legal research and writing, especially during my physical absence from the office – in California – due to the current public health crisis related to COVID-19.

I am highly conscious of needlessly expending CJA funds. In this case I believe the appointment of my associate will actually result in a saving by relieving me of tasks that would be billed at a higher rate. I respectfully ask Your Honor to approve the appointment of Ms. Sochacki at a billing rate of \$90.00 per hour *nunc pro tunc* to March 6, 2020.

IRVING COHEN
ATTORNEY AT LAW

Very truly yours,

/s/ Irving Cohen
IRVING COHEN